

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

In the Matter of:

Jeffrey David Hurley
Lyn Marie Hurley
Debtor(s)

Case No. 10-35686
Chapter 13 Bankruptcy
Hon. Daniel S. Opperman

**DEBTORS' RESPONSE TO CREDITOR'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY AND WAIVING THE PROVISION OF FRBP 4001 (A)(3)**

NOW COMES Debtor(s), Jeffrey David Hurley and Lyn Marie Hurley, by and through his attorney, David W. Brown P58113, and for his answer to Creditor's Motion for Relief from the Automatic Stay and Waiving the Provision of FRBP 4001 (a)(3), hereby states as follows:

1. In answer to Paragraph 1 of Creditor's motion, Debtors admit the allegations contained therein.
2. In answer to Paragraph 2 of Creditor's motion, Debtors admit the allegations contained therein.
3. In answer to Paragraph 3 of Creditor's motion, Debtors admit the allegations contained therein.
4. In answer to Paragraph 4 of Creditor's motion, Debtors admit the allegations contained therein.
5. In answer to Paragraph 5 of Creditor's motion, Debtors admit the allegations contained therein. Adding that said taxes shall be paid pursuant to the Chapter 13 Plan terms.
6. In answer to Paragraph 6 of Creditor's motion, Debtors neither admit nor deny the allegations contained therein.
7. In answer to Paragraph 7 of Creditor's motion, Debtors admit the allegations contained therein.
8. In answer to Paragraph 8 of Creditor's motion, Debtors neither admit nor

deny the allegations contained therein.

9. In answer to Paragraph 9 of Creditor's motion, Debtors neither admit nor deny the allegations contained therein.
10. In answer to Paragraph 10 of Creditor's motion, Debtors deny the allegations contained therein.
11. In answer to Paragraph 11 of Creditor's motion, Debtors admit the allegations contained therein.
12. In answer to Paragraph 12 of Creditor's motion, Debtors neither admit nor deny the allegations contained therein.
13. In answer to Paragraph 13 of Creditor's motion, Debtors deny the allegations contained therein.
14. In answer to Paragraph 14 of Creditor's motion, Debtors deny the allegations contained therein.
15. In answer to Paragraph 15 of Creditor's motion, Debtors deny the allegations contained therein.
16. In answer to Paragraph 16 of Creditor's motion, Debtors admit the allegations contained therein.
17. In answer to Paragraph 17 of Creditor's motion, Debtors deny the allegations contained therein.
18. In answer to Paragraph 18 of Creditor's motion, Debtors deny the allegations contained therein.
19. In answer to Paragraph 19 of Creditor's motion, Debtors neither admit nor deny the allegations contained therein.
20. In answer to Paragraph 20 of Creditor's motion, Debtors neither admit nor deny the allegations contained therein.

WHEREFORE, the Debtors request that Creditor's motion be denied.

Respectfully submitted,
LAW OFFICES OF DAVID W. BROWN PLLC

/s/ David W. Brown P58113
David W. Brown P58113

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